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BY FACSIMILE & ECF

Hon. Shira A. Scheindlin
United States District Judge
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: United States v. John Melicharek
Client: Michel Iuni
07 Cr. 907 (SAS)

November 19, 2007

RECEIVED	J. CHAMBERS OF
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U.S. DISTRICT COURT	
THE BRONX IN	
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DOC #:	<u>11/20/07</u>
DATE FILED:	<u>11/20/07</u>

Dear Judge Scheindlin:

Please accept this letter as a request to modify the conditions of release for Michael Iuni so as to facilitate his attending medical and dental treatment and visit with legal counsel.

On October 23, 2007 following hearing the court granted bail to Michael Iuni with conditions of release which included the following: \$1,000,000.00 PRB secured by parents home and signed by defendant's parents, brother and sister; home detention with electronic monitoring; defendant to reside with his parents at his parent's home ; voluntary out-patient drug treatment; defendant to travel to drug treatment program only."

The defendant suffers from severe respiratory ailments for which has been receiving treatment for the past several years by Dr. Dobkin. On Monday November 26 Mr. Iuni has an appointment with his pulmunologist, Dr. Dopkin. Dr. Dopkin's office is located at 1515 Benedick Avenue, Bronx, N.Y. The office is adjacent to the Albert Einstein Medical Facility. His appointment is scheduled for 1:45 P.M. His visits usually take approximately one hour. In addition Mr. Iuni requires to see his dentist at the earliest possible convenience.

It is proposed that Mr. Iuni's electronic monitoring be turned off between 1:00-3:45 P.M. to permit him to visit Dr. Dopkin. Similar specific time arrangements will be made for the purpose of the defendant visiting his dentist and with the undersigned to review the recently provided discovery.

It is respectfully requested that Mr. Iuni's conditions of release be modified to permit him to leave his residence to attend to these pressing medical issues. I have spoken with AUSA Benjamin Gruenstein and Pre-trial Officer Scott Kowal and both consent to his modification.

*Request for release conditions modified to permit medical visits as needed
So Ordered: Shaffer 11/20/07*

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Respectfully submitted,
Alan Nelson

cc: AUSA Benjamin Gruenstein (ECF)